

Aloha FCC Commissioners!

Amateur use of Winlink has recently begun in Hawaii. Thru donations we have been fortunate to invest about \$50K in Winlink gateways and private stations. While we use only Pactor 3 mode, our equipment was purchased with the expectation of being able to take advantage of developing technologies at higher rates of transmission that perform well under adverse propagation conditions. Many other US Amateur Radio groups have invested time and capital in developing EMCOMM facilities dependent on high speed digital communication technology. The total US investment dwarfs Hawaii's. FCC action on Docket 16-239 should consider our investments.

The situation in Hawaii, an island state in the middle of the Pacific, is unique. Our ability to communicate is dependent on fiber and satellite links that can be fragile. If we become dependent on HF links during a major emergency, access to higher speeds will be an important lifeline to the mainland for our communities and citizens.

Our group is extending digital communications to other US territories in the Pacific and island nations. History gives us relationships to these independent countries. The FCC should promote digital communications in support of continuing strong relationships.

Amateur Radio is active in extending digital soundcard protocols to improve use of the subbands allocated to the Amateur Service in Part 97.221. In addition to the Amateur Radio Safety Foundation's Inc.(ARSFI) development of ARDOP, a Spanish Amateur Radio Licensee (EA5HVK) has developed VARA for HF and VARA FM using new mathematical algorithms to improved speeds and reliability of Amateur Radio communications. FCC action on 16-239 should allow our scientists the ability to continue advancement of the art. It would be unfortunate if FCC action restricted American innovation in digital communications.

Others have addressed the false claims about bandwidth and encryption. Rather than repeat those arguments I simply agree with the comments filed by the ARSFI group. There is no threat to other services or cyber security. Faux claims should not be used to justify outside commercial interests.

Every jurisdiction in the world already support these Amateur Radio communications modes. The FCC should support US innovation.

We strongly support removal of the symbol rate restriction proposed in Docket 16-239. Action is overdue. Every foreign governing Authority has long ago removed restrictions impeding technology development.

Mahalo,

Joseph Speroni, FCC Licensee AHØA

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